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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TETSUYA NAKAMURA, an individual,

Plaintiff/Counterclaim
Defendant,

v.

SUNDAY GROUP INCORPORATED,
a Delaware Corporation, *et al.*,

Defendants/Counterclaimants.

Case No.: 2:22-CV-01324-MMD-EJY

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME AND
REVISING STANDARD BRIEFING
SCHEDULE ON PLAINTIFF'S
MOTION TO COMPEL**

(FIRST REQUEST)

Plaintiff Tetsuya Nakamura and Defendants Sunday Group Incorporated, SGI Trust, Toshiki
(Todd) Mitsuishi and James Pack (collectively, "Defendants"), hereby stipulate as follows:

WHEREAS, Plaintiff filed a Motion to Compel Documents Responsive to Discovery Requests
("Motion to Compel") (Dkt. No. 99/100) on February 21, 2025.

1 WHEREAS, under Civil LR 7-2(b), Defendants' Response to Plaintiffs Motion to Compel is
2 currently due by March 7, 2025, and Plaintiff's Reply in Support of the Motion is currently due by
3 March 14, 2025;

4 WHEREAS, due to the current workloads and other conflicts of counsel for the parties, and in
5 order to provide the parties with the time and opportunity to try to narrow the issues before the Court
6 in relation to the Motion to Compel, the parties have determined they would mutually benefit from a
7 revision of the standard briefing schedule on the Motion to Compel to provide each of side with a one-
8 week extension of time in relation to the Motion to Compel;

9 WHEREAS, in light of the foregoing, Plaintiff does not object to a one-week extension of time
10 for Defendants to respond to the Motion to Compel, and Defendants do not object to a one-week
11 extension of time for Plaintiff to file a Reply in Support of the Motion to Compel;

12 WHEREAS, this is the first stipulation for an extension of time in relation to Plaintiffs' Motion
13 to Compel;

14 **IT IS ACCORDINGLY STIPULATED**, pursuant to LR IA 6-1 and 6-2, that:

- 15 1. Defendants shall file their opposition to the Motion to Compel by March 14, 2025.
 - 16 2. Plaintiff shall file any reply to the opposition by March 28, 2025.
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1 DATED: March 6, 2025

CLYDE SNOW & SESSIONS, P.C.

2 By: /s/ Aaron D. Lebenta
Aaron D. Lebenta (UT Bar # 10180)

3 Attorneys for Defendants
4 SUNDAY GROUP INCORPORATED,
5 SGI TRUST, TOSHIKI (TODD) MITSUISHI
AND JAMES PACK

6 DATED: March 6, 2025

FENWICK & WEST LLP

7 By: /s/ Casey O'Neill
8 Casey O'Neill

9 Attorneys for Plaintiff
TETSUYA NAKAMURA

10 **ORDER**

11 IT IS SO ORDERED:

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15 THE HONORABLE ELAYNA J. YOUCHAH
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: March 7, 2025